

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C.

In the Matter of)	
)	
The Development of Operational,)	
Technical and spectrum Requirements)	
For Meeting Federal, State, and Local)	WT Docket No. 96-86
Public Safety Agency Communications)	
Requirements Through the Year 2010)	
)	
Establishment of Rules and Requirements)	
For Wideband Channel Access)	

REGARDING WIDEBAND DATA EQUIPMENT

Dataradio is an equipment manufacturer and public safety data network designer and installer with offices in Atlanta GA, and Waseca MN.

In its final communication to the FCC, the NCC has recommended that the FCC adopt TIA-902 as the standard for use on the interoperability channels. Motorola, the owner of this proprietary technology, has indicated that it will license the technology without royalty only for use on the interoperability channels.

Further, the NCC is recommending that all wideband data equipment must be capability of operating on the interoperability channels. This in essence requires that all equipment must incorporate TIA-902 proprietary technology.

If the FCC supports this recommendation, this requirement will increase the complexity of 700 Mhz wideband data equipment, delay equipment availability from other manufacturers, and increase the costs of these devices.

Other manufacturers will be at a significant disadvantage to offer competitive equipment. They will be required to pay royalties to use TIA-902 on the general use channels; and to develop an alternative technology incurs further cost and delay.

Mandating that all 700 Mhz wideband data devices incorporate TIA-902 may stifle technical evolution. The wireless arena is constantly the benefactor of technological innovation. Adopting a rigid standard may serve to limit the application of such technology.

Dataradio believes that TIA-902 is not suited for all potential 700 Mhz deployments. In particular, we suspect that the increased infrastructure costs will prohibit a cost-effective deployment in low density rural systems. As well, since TIA-902 technology is similar to that employed in Nextel, there is some concern that there may be interference not unlike that currently affecting the 800 Mhz public safety band.

Wideband data interoperability is of questionable merit. Of note is that data applications are themselves not interoperable and are designed to make unauthorized use impossible. In our view, it is unlikely that first responders will use text messaging to the extent that this communication could not be provided by

interoperable narrow band equipment. To this end, providing an interoperable “talk-around” mode for wideband data is nonsensical.

Interoperability is best solved by interconnecting systems. At present, there is no standard for the interconnection of TIA-902 systems.

Requiring that all wideband equipment can operate on the interoperable channels is not in the interest of the public safety user. The FCC should focus its efforts on the development of technical standards for the efficient use of the RF spectrum, and let the user community determine the extent to which interoperable capable equipment is required.

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